

Exhibit B

EXHIBIT B

SAMSUNG ELECTRONICS CO., LTD., AND SAMSUNG ELECTRONICS AMERICA, INC.’S PROPOSED CONSTRUCTIONS FOR DISPUTED CLAIM TERMS, PHRASES, AND CLAUSES, AND PROPOSED EVIDENCE IN SUPPORT

SAMSUNG’S ASSERTED INDEFINITENESS TERMS

No.	Term	Samsung’s Indefiniteness Position¹	NuCurrent’s Position
1.	“at least one of the first conductor layer” (’960 Patent, Claim 4)	This claim is indefinite because the phrase “at least one of the first conductor layer” is incomplete and ambiguous. A person of ordinary skill in the art would not understand this limitation because it requires “at least one of” only one thing.	Not indefinite A person of ordinary skill in the art would understand this term to refer to “the first conductor layer.”
2.	“at a given frequency” (’960 Patent, Claims 5-7;)’046 Patent, Claims 5-7)	These claims are indefinite because a person of ordinary skill in the art would be unable to determine where the “given frequency” is measured and what a “given frequency” is.	Not indefinite A person of ordinary skill in the art would understand this term to refer to a resonate or operational frequency of the inductor.
3.	“at least one connector” (’960 Patent, Claim 18)	This claim is indefinite because it recites “at least one connector electrically connects the first conductor layer and the second conductor,” but it depends from claim 1 that includes the limitation “at least one connector electrically connects the first conductor layer and the second conductor.” A person of ordinary skill in the art would be unable to determine the number of connectors required by this claim.	Not indefinite A person of ordinary skill in the art would understand this term to require there to be at least two connectors to electrically connect the first conductor layer and second connector layer in parallel.
4.	“at least the first and second conductor layers has at least a partial revolution” (’960 Patent, Claim 25;)’046 Patent, Claim 24;	These claims are indefinite because a person of ordinary skill in the art would be unable to determine which conductor layer(s) it applies to or what degree of curvature constitutes a partial	Not indefinite. A person of ordinary skill in the art would understand this term to apply to both the first

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No.	Term	Samsung's Indefiniteness Position ¹	NuCurrent's Position
	'591 Patent, Claim 25; '948 Patent, Claim 25)	revolution.	conductive layer and the second conductive layer. A person of ordinary skill in the art would understand "partial revolution" to mean that the conductor does not complete a full turn.
5.	"at least one insulator layer" ('960 Patent, Claim 27; '046 Patent, Claim 26; '591 Patent, Claim 27; '948 Patent, Claim 27)	These claims are indefinite because a person of ordinary skill in the art would be unable to determine whether the "at least one insulator layer" refers to the single insulator layer of claim 1, or additional/other insulator layer(s).	Not indefinite. A person of ordinary skill in the art would understand this term to refer to "the insulator layer."
6.	"the first conductor layer" ('960 Patent, Claim 29)	This claim is indefinite because "the first conductor layer" lacks an antecedent basis.	Not indefinite. A person of ordinary skill in the art would understand this term to get its antecedent basis from "a first conductive conductor layer," where the term conductive is merely used as an adjective.
7.	"wherein the first and second conductor layers are connected electrically in parallel" ('046 Patent, Claim 19)	This claim is indefinite because a person of ordinary skill in the art would be unable to determine whether a new parallel connection between the first and second conductor layers is introduced or whether it reiterates a limitation from claim 1, from which it depends.	Not indefinite. A person of ordinary skill in the art would understand this term to clarify and reiterate that the first conductive layer and second conductive layer are connected in parallel in contrast with their connection in series to the third and fourth conductive layers.
8.	"the inductor" ('046 Patent, Claim 28)	This claim is indefinite because it introduces "an inductor structure," "a first inductor subassembly," and "a second inductor subassembly," but then ambiguously refers to "the inductor." A person of ordinary skill in the art would be unable to determine to which inductor the limitation refers.	Not indefinite. A person of ordinary skill in the art would understand this term to refer to "the inductor structure."

No.	Term	Samsung's Indefiniteness Position ¹	NuCurrent's Position
9.	“[wherein the second coil is disposed on the substrate surface] positioned one of within an inner perimeter formed by the innermost turn of the first coil and adjacent the first coil” (’729 Patent, Claim 1)	This claim is indefinite because the specification refers to coils disposed concentrically as “adjacent,” but the claim is written such that “within” and “adjacent” are mutually exclusive options. A person of ordinary skill in the art would be unable to determine the bounds of this claim.	Not indefinite. See proposed construction below at No. 7.
10.	“has a variable wire width” (’729 Patent, Claim 11)	This claim is indefinite because a person of ordinary skill in the art would be unable to determine how much the wire width must vary.	Not indefinite. See proposed construction below at No. 11.
11.	“unshielded inductance” (’729 Patent, Claim 24)	This claim is indefinite because a person of ordinary skill in the art would not understand the term “unshielded inductance” and it is not defined in the specification.	Not indefinite. A person of ordinary skill in the art would understand this term to refer to the inductance of the coil without shielding.

SAMSUNG’S PROPOSED CLAIM CONSTRUCTIONS

No.	Term	Samsung’s Proposed Construction	NuCurrent’s Position	Samsung’s Supporting Evidence ²	
				Intrinsic Evidence ³	Extrinsic Evidence
1.	“selecting an adjustable inductor quality factor” (’591 Patent, Claims 1, 35)	“switching an electrical connection between the first and second conductors”	Plain and ordinary meaning <u>Alternative</u> : “changing the inductor quality factor”	<i>See, e.g.</i> , ’591 patent at 4:8-26; 5:49-59; 6:21-24; 6:61-66; 8:18-37; 9:59-65; 10:30-39; 11:47-54; 14:66-15:3; 16:47-61; 19:63-21:6; 21:27-36; 22:33-40; 22:50-23:18; 27:21-30; 28:8-29:13; Figs. 8, 9A, 9B, 10A, 11A, 12A-12C, 15-18.	<i>See, e.g.</i> , NCSAM00020773 (<i>Q</i> , Fundamentals of Power Electronics (2001)); NCSAM00020798 (<i>Select</i> , Merriam-Webster Collegiate Dictionary (11th ed. 2003)); NCSAM00020821 (<i>Q</i> , Wiley Electrical and Electronics Engineering Dictionary (2004)); NCSAM00020782 (<i>Quality factor</i> , IEEE Standard Dictionary for Electrical and Electronics Terms (1996)).
2.	“electrically connectable” (’591 Patent, Claims 1, 20, 21, 24, 35, 39); (’960 Patent, Claims 21, 24);	“capable of being physically connected by a conductive path”	Plain and ordinary meaning <u>Alternative</u> : “capable of being linked together by means of electricity”	<i>See, e.g.</i> , ’591 patent: Abstract; 5:27-29; 7:22-24; 9:58-64; 10:7-9; 10:18-22; 11:3-9; 11:51-54; 15:1-3; 16:13-19; 15:37-44; 18:65-19:2; 19:20-42; 27:50-52; 27:60-28:17; 28:18-20;	<i>See, e.g.</i> , NCSAM00020798 (<i>Connected</i> , Merriam-Webster Collegiate Dictionary (11th ed. 2003)); NCSAM00020809 (<i>Electrically connected</i> ,

² Samsung reserves the right to rely on any and all intrinsic and extrinsic evidence cited by NuCurrent and the patents-in-suit and their file histories. Samsung further reserves the right to rely on additional intrinsic evidence necessary for a full and complete understanding of the evidence cited herein by any party.

³ All citations to supporting evidence for claims from the ’960, ’046, ’591, and ’948 patents refer to the ’591 patent’s specification (which is substantively identical to the ’960, ’046, and ’948 patent specifications).

No.	Term	Samsung's Proposed Construction	NuCurrent's Position	Samsung's Supporting Evidence ²	
				Intrinsic Evidence ³	Extrinsic Evidence
	<p>('948 Patent, Claims 1, 20, 21, 24, 33)</p> <p>"electrically connected/connecting" ('591 Patent, Claims 1, 20, 35, 37);</p> <p>('960 Patent, Claims 1, 20, 29);</p> <p>('046 Patent, Claims 17, 19);</p> <p>('948 Patent, Claims 1, 18, 20, 29, 31)</p>	"physically connected/connecting by a conductive path"	<u>Alternative</u> : "linked together by means of electricity"	<p>28:59-63; 29:59-30:8; Figs. 4F, 6B, 14B, 15-18.</p> <p><i>See, e.g.</i>, '786 patent (Parent): NCSAM00021026-59 1:27-31; 3:6-7; 3:63-64; 4:44-50; 5:3-10; 7:21-26; 12:37-40; 14:12-15; 23:31-34; Claim 1; Claim 2; Claim 4; Figs. 3A, 3B, 14A.</p> <p><i>See, e.g.</i>, '591 FH at NUCUR-0000545-54 (Amendment, 2013-10-29).</p> <p><i>See, e.g.</i>, '948 FH at NUCUR-0000741-50 (Amendment, 2013-10-18).</p> <p><i>See also</i> Supporting Evidence for "electrically parallel connection."</p>	<p>Modern Dictionary of Electronics (7th Ed. 1999)); NCSAM00020821 (<i>Connected</i>, Wiley Electrical and Electronics Engineering Dictionary (2004)); NCSAM00020782 (<i>Electrically connected</i>, IEEE Standard Dictionary for Electrical and Electronics Terms (1996)).</p>
3.	"electrically parallel connection" ('046 Patent, Claim 1)	"physically connected in parallel by a conductive path or paths"	<p>Plain and ordinary meaning</p> <p><u>Alternative</u>: "linked together in parallel by means of electricity"</p>	<p><i>See, e.g.</i>, '591 patent at Abstract; 7:4-7; 7:22-24; 8:4-8; 10:4-22; 11:3-9; 15:37-16:19; 17:10-14; 18:42-51; 19:3-15; 19:20-23; 20:44-67; Figs. 6B, 14B.</p> <p><i>See also</i> Supporting Evidence</p>	<p><i>See, e.g.</i>, NCSAM00020798 (<i>Connected</i>, Merriam-Webster Collegiate Dictionary (11th ed. 2003)); NCSAM00020809 (<i>Electrically connected</i>, Modern Dictionary of</p>

No.	Term	Samsung's Proposed Construction	NuCurrent's Position	Samsung's Supporting Evidence ²	
				Intrinsic Evidence ³	Extrinsic Evidence
				for "electrically connectable."	Electronics (7th Ed. 1999)); NCSAM00020821 (<i>Connected</i> , Wiley Electrical and Electronics Engineering Dictionary (2004)); NCSAM00020782 (<i>Electrically connected</i> , IEEE Standard Dictionary for Electrical and Electronics Terms (1996)).
4.	"adjusting an input power level of the power source" ('591 Patent, Claim 1)	"adjusting the power level supplied to the power source for the first electrical circuit"	Plain and ordinary meaning <u>Alternative</u> : "adjusting the power level supplied to the power source"	<i>See, e.g.</i> , '591 patent at 30:27-43; Fig. 20. <i>See, e.g.</i> , '591 FH at NUCUR-0000545-54 (Amendment, 2013-10-29). <i>See, e.g.</i> , '948 FH at NUCUR-0000741-50 (Amendment, 2013-10-18).	<i>See, e.g.</i> , NCSAM00020773 (<i>Power source element</i> , Fundamentals of Power Electronics (2001)); NCSAM00020782 (<i>Power source; Power supply, direct-current (alternating-current to direct-current); Power level (data transmission); Power supply, direct-current regulated; Power supply, uninterruptible</i> , IEEE Standard Dictionary for Electrical and Electronics Terms (1996)); NCSAM00020814 (<i>Power supply; Input</i> , Webster's

No.	Term	Samsung's Proposed Construction	NuCurrent's Position	Samsung's Supporting Evidence ²	
				Intrinsic Evidence ³	Extrinsic Evidence
					Third New International Dictionary (2002)); NCSAM00020821 (<i>Input power</i> , Wiley Electrical and Electronics Engineering Dictionary (2004)); NCSAM00020756 (<i>Input</i> , Academic Press Dictionary of Sci and Tech (1992)); NCSAM00020764 (<i>Input; Input power</i> , American Heritage Dictionary of English Language (2000)); NCSAM00020798 (Merriam-Webster Collegiate Dictionary (11th ed. 2003)).
5.	"adjusting a power level of the power source" ('591 Patent, Claim 35); ('948 Patent, Claims 1, 29)	"adjusting the power level of the power source for the first electrical circuit"	Plain and ordinary meaning <u>Alternative</u> : "adjusting the power level of the power source"	<i>See, e.g.</i> , '591 patent at 30:27-43; Fig. 20. <i>See, e.g.</i> , '591 FH at NUCUR-0000545-54 (Amendment, 2013-10-29). <i>See, e.g.</i> , '948 FH at NUCUR-0000741-50 (Amendment, 2013-10-18).	<i>See, e.g.</i> , NCSAM00020773 (<i>Power source element</i> , Fundamentals of Power Electronics (2001)); NCSAM00020782 (<i>Power level; Power source; Power supply, direct-current regulated; Power supply, uninterruptable</i> , IEEE Standard Dictionary

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				Intrinsic Evidence ³	Extrinsic Evidence
					for Electrical and Electronics Terms (1996)).
6.	<p>Nth "conductor layer" ('960 Patent, Claims 1, 4-8, 10, 12, 16, 18-20, 25-26, 29);</p> <p>('046 Patent, Claims 1, 5-8, 10, 15, 17-19, 24-25, 28);</p> <p>('591 Patent Claims 25, 35)</p> <p>Nth "conductor" ('591 Patent, Claims 1, 4, 6-8, 10, 16, 18-20, 25, 26, 35);</p> <p>('948 Patent, Claims 1, 4, 6-8, 10, 16, 18-20, 25, 26, 29)</p>	<p>Second conductor layer: "a conductor layer overlapping the first conductor layer"</p> <p>Third conductor layer: "a conductor layer overlapping the second conductor layer"</p> <p>Fourth conductor layer: "a conductor layer overlapping the third conductor layer"</p> <p>Second conductor: "a conductor overlapping the first conductor"</p> <p>Third conductor: "a conductor overlapping the second conductor"</p> <p>Fourth conductor: "a conductor overlapping the third conductor"</p>	"a material, other than litz wires and stranded traces, that conducts electricity"	<p><i>See, e.g.</i>, '591 patent at Abstract; 2:29-36; 4:16-26; 4:27-38; 4:45-54; 4:55-5:5; 5:9-12; 5:13-24; 5:30-43; 5:49-59; 7:4-11; 7:18-22; 7:33-35; 7:51-56; 8:4-8; 8:63-67; 9:8-16; 9:65-67; 10:4-23; 11:3-17; 11:42-54; 12:32-36; 12:45-53; 12:58-67; 13:4-7; 13:9-12; 13:26-35; 15:8-16; 15:33-44; 14:54-58; 16:6-19; 16:39-46; 18:42-19:15; 19:20-48; 20:6-21:46; 22:33-66; 23:6-17; 23:19-36; 23:43-50; 24:16-24; 24:43-45; 26:35-37; 27:37-28:29; 28:64-29:3; 29:14-30; 29:55-58; 30:56-31:10; 31:19-31; Figs. 2E, 3A-3B, 5A, 6A-15, 17, 21.</p> <p><i>See, e.g.</i>, '591 FH at NUCUR-0000545-54 (Amendment, 2013-10-29).</p> <p><i>See, e.g.</i>, '948 FH at NUCUR-0000741-50 (Amendment, 2013-10-18).</p>	<p><i>See, e.g.</i>, NCSAM00020764 (<i>Layer</i>, American Heritage Dictionary of English Language (2000)); NCSAM00020798 (<i>Layer</i>, Merriam-Webster Collegiate Dictionary (11th ed. 2003)); NCSAM00020814 (<i>Layer</i>, Webster's Third New International Dictionary (2002)).</p>

No.	Term	Samsung's Proposed Construction	NuCurrent's Position	Samsung's Supporting Evidence ²	
				Intrinsic Evidence ³	Extrinsic Evidence
7.	<p>“[wherein the second coil is disposed on the substrate surface] positioned one of within an inner perimeter formed by the innermost turn of the first coil and adjacent the first coil” (’729 Patent, Claim 1)</p>	<p>“[wherein the second coil is disposed on the substrate surface] positioned within an inner perimeter formed by the innermost turn of the first coil, either in the same plane as the first coil or in a second plane”</p> <p>OR</p> <p>Indefinite</p>	<p>Plain and ordinary meaning</p> <p><u>Alternative:</u> [wherein the second coil is disposed on the substrate surface] positioned either (1) within the first coil or (2) adjacent to the first coil</p>	<p><i>See, e.g.</i>, ’729 patent at 3:22-4-6:3; 9:54-60; 10:1-11:17; 11:28-49; 12:14-13:13; 13:35-55; 14:57-15:2; 15:12-18; 15:29-40; 17:44-51; 18:58-19:2; 19:41-62; 20:52-22:52; Figs. 2, 3, 3B-3F, 4, 6A-6E, 9.</p> <p><i>See, e.g.</i>, ’729 FH at NCSAM00021462 (Prosecution History, Office Action, 2016-12-20); NCSAM00021418 (Prosecution History, Amendment, 2017-03-20); NCSAM00021393 (Prosecution History, Office Action, 2017-05-05); NCSAM00021348 (Prosecution History, Amendment, 2017-07-05); NCSAM00021306 (Prosecution History, Examiner-Initiated Interview Summary, 2017-08-15); NCSAM00021322 (Prosecution History, Amendment, 2017-08-15); NCSAM00021270</p>	

No.	Term	Samsung's Proposed Construction	NuCurrent's Position	Samsung's Supporting Evidence ²	
				Intrinsic Evidence ³	Extrinsic Evidence
				(Prosecution History, Office Action, 2017-09-19); NCSAM00021194 (Prosecution History, Amendment, 2017-12-07); NCSAM00021144 (Prosecution History, Examiner-Initiated Interview Summary, 2018-02-01); NCSAM00021132 (Prosecution History, Notice of Allowance, 2018-02-01). <i>See also</i> Supporting Evidence for "a third gap separating the outermost turn of the second coil from the innermost turn of the first coil."	
8.	"wherein the first end of the second coil meets and joins the second end of the first coil forming a continuous junction therebetween" ('729 Patent, Claim 1)	"wherein an electrical connection is established between the first end of the second coil and the second end of the first coil forming a continuous connection therebetween"	Plain and ordinary meaning	<i>See, e.g.,</i> '729 patent at 4:46-67; 5:16-35; 5:36-6:19; 10:1-10:3; 11:31-12:17; 26:37-50; 28:54-29:5; 29:29-31:5; Figs. 2-2A; 12A-12C. <i>See, e.g.,</i> '729 FH at NCSAM00021462 (Prosecution History, Office Action, 2016-12-20); NCSAM00021418 (Prosecution History,	

No.	Term	Samsung's Proposed Construction	NuCurrent's Position	Samsung's Supporting Evidence ²	
				Intrinsic Evidence ³	Extrinsic Evidence
				Amendment, 2017-03-20); NCSAM00021393 (Prosecution History, Office Action, 2017-05-05); NCSAM00021348 (Prosecution History, Amendment, 2017-07-05); NCSAM00021322 (Prosecution History, Amendment, 2017-08-15); NCSAM00021270 (Prosecution History, Office Action, 2017-09-19); NCSAM00021194 (Prosecution History, Amendment, 2017-12-07); NCSAM00021132 (Prosecution History, Notice of Allowance, 2018-02-01).	
9.	"a third gap separating the outermost turn of the second coil from the innermost turn of the first coil" ('729 Patent, Claim 1)	"a third space of nonconductive material separating the outermost turn of the second coil from the innermost turn of the first coil"	Plain and ordinary meaning <u>Alternative:</u> "a third space separating the outermost turn of the second coil from the innermost turn of the first coil"	<i>See, e.g.,</i> '729 patent at 3:22-4:6:3; 9:54-60; 10:1-11:17; 11:28-37; 12:14-13:13; 13:35-55; 14:57-15:2; 15:12-18; 15:29-40; 17:44-51; 18:58-19:2; 19:41-62; 20:52-22:52; Figs. 2, 3, 3B-3F, 4, 6A-6E, 9. <i>See, e.g.,</i> '729 FH at NCSAM00021462	<i>See, e.g.,</i> NCSAM00020756 (<i>Gap</i> , Academic Press Dictionary of Sci and Tech (1992)); NCSAM00020788 (<i>Half-wave dipole</i> , IEEE Standard Definitions for Antennas (2004)); NCSAM00020790 (<i>Gap</i> ; <i>Air gap</i> ; <i>Magnetic gap</i> ,

No.	Term	Samsung's Proposed Construction	NuCurrent's Position	Samsung's Supporting Evidence ²	
				Intrinsic Evidence ³	Extrinsic Evidence
				(Prosecution History, Office Action, 2016-12-20); NCSAM00021418 (Prosecution History, Amendment, 2017-03-20); NCSAM00021393 (Prosecution History, Office Action, 2017-05-05); NCSAM00021348 (Prosecution History, Amendment, 2017-07-05); NCSAM00021306 (Prosecution History, Examiner-Initiated Interview Summary, 2017-08-15); NCSAM00021322 (Prosecution History, Amendment, 2017-08-15); NCSAM00021270 (Prosecution History, Office Action, 2017-09-19); NCSAM00021194 (Prosecution History, Amendment, 2017-12-07); NCSAM00021144 (Prosecution History, Examiner-Initiated Interview Summary, 2018-02-01); NCSAM00021132 (Prosecution History, Notice	Illustrated Dictionary of Electronics (8th ed. 2001)); NCSAM00020798 (<i>Gap</i> , Merriam-Webster Collegiate Dictionary (11th ed. 2003)); NCSAM00020814 (<i>Gap</i> , Webster's Third New International Dictionary (2002)); NCSAM00020821 (<i>Gap</i> , Wiley Electrical and Electronics Engineering Dictionary (2004)). <i>See also</i> Supporting Evidence for "[wherein the second coil is disposed on the substrate surface] positioned one of within an inner perimeter formed by the innermost turn of the first coil and adjacent the first coil"

No.	Term	Samsung's Proposed Construction	NuCurrent's Position	Samsung's Supporting Evidence ²	
				Intrinsic Evidence ³	Extrinsic Evidence
				of Allowance, 2018-02-01). <i>See also</i> Supporting Evidence for “[wherein the second coil is disposed on the substrate surface] positioned one of within an inner perimeter formed by the innermost turn of the first coil and adjacent the first coil.”	
10.	“wherein a tunable inductance is generatable by electrically connecting two of the first, second and third terminals” ('729 Patent, Claim 1)	“wherein the inductance can be changed by establishing an electrical connection between two of the first, second, and third terminals”	Plain and ordinary meaning	<i>See, e.g.</i> , '729 patent at 5:5-35; 8:52-67; 11:18-24; 11:50-12:17; 12:31-14:56; 16:48-17:9; 17:44-19:52; 26:17-50; 28:56-31:1; Figs. 2-3A, 4, 7, 10, 12-13. <i>See, e.g.</i> , '729 FH at NCSAM00021462 (Prosecution History, Office Action, 2016-12-20); NCSAM00021418 (Prosecution History, Amendment, 2017-03-20); NCSAM00021393 (Prosecution History, Office Action, 2017-05-05); NCSAM00021348 (Prosecution History, Amendment, 2017-07-05);	<i>See, e.g.</i> , NCSAM00020764 (<i>Tunable</i> , American Heritage Dictionary of English Language (2000)); NCSAM00020790 (<i>Tuning</i> ; <i>Tuning coil</i> ; <i>Variable inductor</i> , Illustrated Dictionary of Electronics (8th ed. 2001)); NCSAM00020798 (<i>Generate</i> , Merriam-Webster Collegiate Dictionary (11th ed. 2003)); NCSAM00020821 (<i>Tunable</i> ; <i>Tune</i> , Wiley Electrical and Electronics Engineering Dictionary (2004)).

No.	Term	Samsung's Proposed Construction	NuCurrent's Position	Samsung's Supporting Evidence ²	
				Intrinsic Evidence ³	Extrinsic Evidence
				NCSAM00021322 (Prosecution History, Amendment, 2017-08-15); NCSAM00021270 (Prosecution History, Office Action, 2017-09-19); NCSAM00021194 (Prosecution History, Amendment, 2017-12-07); NCSAM00021132 (Prosecution History, Notice of Allowance, 2018-02-01).	
11.	"has a variable wire width" ('729 Patent, Claim 11)	"has a width that forms a single continuous taper from end to end" OR Indefinite	Plain and ordinary meaning <u>Alternative:</u> "has a non-constant width"	<i>See, e.g.,</i> '729 patent at 22:53-23:10; 23:11-22; Fig 5.	